

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 12-MJ-7003-JCB
)	
LINDA LOUISE CULKIN,)	
Defendant)	

**GOVERNMENT’S MOTION FOR ADDITIONAL REDACTIONS, WITHOUT
OBJECTION**

Under 18 U.S.C. § 3771(a)(8), the United States moves the Court to order that the transcript of the detention hearing held on January 23, 2012, be redacted on page 14, line 18, to replace the last name of K.S., a victim, with K.S.’s initials; on page 18, line 21, to replace the name of the business identified there, a victim, with the words “New York business”; and on page 46, line 24, to again replace the name of the business with the words “New York business.”

The United States would normally move to redact a transcript according to the procedures set forth in the Court’s transcript redaction policy. But that policy is inapplicable here: it covers only Social Security numbers, financial account numbers, dates of birth, home addresses, and names of minor children. The names of K.S. and the New York business do not fall under the policy, because they are not minor children. Instead, the policy states that these types of redaction should be requested in a separate “Motion for Additional Redactions,” as the United States does today.

The United States seeks to redact the names of K.S. and the New York business to protect their privacy. As the Court is aware, Defendant was charged with making multiple abusive threats against K.S., the New York business, and others. Under 18 U.S.C. § 3771(a)(8), a crime victim has “[t]he right to be treated with fairness and with respect for the victim’s dignity and privacy.” To respect their privacy, the United States has tried to refer to the victims only by their initials or other

labels. Redacting the transcript to do the same would be consistent with this practice and the victims' rights to privacy.

Defendant's attorney has told the United States that the defense does not object to this motion.

On these grounds, the United States moves the Court to order that the transcript of the detention hearing held on January 23, 2012, be redacted as specified above.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Scott L. Garland
SCOTT L. GARLAND
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document is being filed through the ECF system and therefore will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Scott L. Garland
SCOTT L. GARLAND
Assistant U.S. Attorney

Date: February 29, 2012